

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111

SPENCER P. HUGRET (SBN: 240424)
shugret@grsm.com
KATHERINE P. VILCHEZ (SBN: 212179)
kvilchez@grsm.com
TRINA M. CLAYTON (SBN: 204215)
tclayton@grsm.com
GORDON REES SCULLY MANSUKHANI, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111
Telephone: (415) 875-3193
Facsimile: (415) 986-8054

Attorneys for Defendant
FCA US LLC

Tionna Dolin (SBN 299010)
tdolin@slpattorney.com
Rebecca E. Neubauer (SBN 333904)
rneubauer@slpattorney.com
STRATEGIC LEGAL PRACTICES, APC
1888 Century Park East, 19th Floor
Los Angeles, CA 90067
Telephone: (310) 929-4900
Facsimile: (310) 943-3838

Attorneys for Plaintiff
RICHARD BAMBULA

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

RICHARD BAMBULA,

Plaintiff,

vs.

FCA US LLC; and DOES 1 through
10, inclusive,

Defendants.

Case No. 2:22-CV-00996-MCE-KJN

**STIPULATION TO EXTEND
TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFFS'
COMPLAINT; ORDER**

Complaint Filed: June 7, 2022
Trial Date: None set

1 IT IS HEREBY STIPULATED by and between the parties hereto through
2 their respective attorneys that Defendant FCA US LLC may have additional time
3 within which to answer or otherwise respond to Plaintiff RICHARD BAMBULA's
4 ("Plaintiff") Complaint. Therefore, the last day for FCA US LLC to answer or
5 otherwise respond to Plaintiff's complaint is Tuesday, July 12, 2022.

6 Good cause exists for this extension as defense counsel has just been
7 assigned to this case and requires time to become knowledgeable about the case to
8 prepare an initial pleading.

9 This document is being electronically filed through the Court's ECF System.
10 In this regard, counsel for FCA US LLC hereby attests that (1) the content of this
11 document is acceptable to all persons required to sign the document; (2) Plaintiff's
12 counsel has concurred with the filing of this document; and (3) a record supporting
13 this concurrence is available for inspection or production if so ordered.

14 Respectively submitted,

15
16 Dated: July 8, 2022

GORDON REES SCULLY MANSUKHANI, LLP

17 By: /s/ Trina M. Clayton
18 Spencer P. Hugret
19 Katherine P. Vilchez
20 Trina M. Clayton
Attorneys for Defendant
FCA US LLC

21
22 Dated: July 8, 2022

STRATEGIC LEGAL PRACTICES, APC

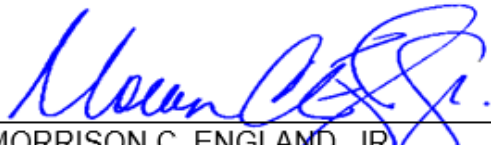
23
24 By: /s/ Rebecca E. Neubauer
25 Tionna Dolin
26 Rebecca E. Neubauer
Attorneys for Plaintiff
RICHARD BAMBULA

ORDER

Pursuant to the parties' stipulation, IT IS HEREBY ORDERED THAT Defendant FCA US LLC should answer or otherwise respond to Plaintiff's complaint on or before Tuesday, July 12, 2022.

IT IS SO ORDERED.

Dated: July 8, 2022


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE

Gordon Rees Scully Mansukhani, LLP
275 Battery Street, Suite 2000
San Francisco, CA 94111